

1 ROB BONTA
Attorney General of California
2 NICKLAS A. AKERS (SBN 211222)
Senior Assistant Attorney General
3 BERNARD A. ESKANDARI (SBN 244395)
Supervising Deputy Attorney General
4 JOSHUA OLSZEWSKI-JUBELIRER (SBN 336428)
MEGAN O'NEILL (SBN 343535)
5 MARISSA ROY (SBN 318773)
Deputy Attorneys General
6 455 Golden State Ave., Suite 11000
San Francisco, CA 94102-7004
7 Telephone: (415) 510-4400
Fax: (415) 703-5480
8 E-mail: joshua.olszewskijubelirer@doj.ca.gov
Attorneys for Plaintiff the People of the State of
9 *California*

10 *Additional parties and counsel listed on signature*
11 *pages*

12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA
14 OAKLAND DIVISION
15

16
17 IN RE: SOCIAL MEDIA ADOLESCENT
18 ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

19 THIS DOCUMENT RELATES TO:

20 ALL ACTIONS
21
22

MDL No. 3047

Case No. 4:22-md-03047-YGR-PHK

**STATE PLAINTIFFS' PROPOSAL TO
CLARIFY APPLICATION OF
PROTECTIVE ORDER**

Honorable Yvonne Gonzalez Rogers
Honorable Peter H. Kang

**STATE PLAINTIFFS' PROPOSAL TO CLARIFY APPLICATION OF
PROTECTIVE ORDER**

In accordance with the Honorable Peter H. Kang's invitation at the Discovery Management Conference on December 14, 2023 (Dkt. 484), the State Plaintiffs propose modifying the Protective Order (Dkt. 290) in the following manner:

The following text shall be added to Section 7.6, before subsection (a):

For the avoidance of doubt, information or material received outside of this Action is not subject to Section 7.6, even if such information or material was also produced and designated as "HIGHLY CONFIDENTIAL (COMPETITOR)" Protected Material during the course of this Action. To the extent a Party discloses to an Expert information or material received outside of this Action, the Party is not bound by Section 7.6 with respect to that information or material.

Dated: December 18, 2023

Respectfully submitted,

/s/ Joshua Olszewski-Jubelirer
Deputy Attorney General
California Department of Justice
Office of the Attorney General

*Attorney for Plaintiff the People of the State
of California*

PHILIP J. WEISER

Attorney General
State of Colorado

/s/ Bianca E. Miyata

Bianca E. Miyata (CO Reg. No. 42012),
pro hac vice
Senior Assistant Attorney General
Lauren M. Dickey (CO Reg. No. 45773)
First Assistant Attorney General
Megan Paris Rundlet (CO Reg. No. 27474)
Senior Assistant Solicitor General
Elizabeth Orem (CO Reg. No. 58309)
Assistant Attorney General
Colorado Department of Law
Ralph L. Carr Judicial Center
Consumer Protection Section
1300 Broadway, 7th Floor
Denver, CO 80203
Phone: (720) 508-6651
bianca.miyata@coag.gov

*Attorneys for Plaintiff State of Colorado,
ex rel. Philip J. Weiser, Attorney General*

DANIEL J. CAMERON

Attorney General
Commonwealth of Kentucky

/s/ J. Christian Lewis

J. Christian Lewis (KY Bar No. 87109),
pro hac vice
Philip Heleringer (KY Bar No. 96748),
pro hac vice
Gregory B. Ladd (KY Bar No. 95886),
pro hac vice
Zachary Richards (KY Bar No. 99209),
pro hac vice app. forthcoming
Daniel I. Keiser (KY Bar No. 100264),
pro hac vice app. forthcoming
Assistant Attorneys General
1024 Capital Center Drive, Ste. 200
Frankfort, KY 40601
christian.lewis@ky.gov
philip.heleringer@ky.gov
greg.ladd@ky.gov
zach.richards@ky.gov
Phone: (502) 696-5300
Fax: (502) 564-2698

*Attorneys for Plaintiff the Commonwealth of
Kentucky*

ATTESTATION

I hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: December 18, 2023

By: /s/ Joshua Olszewski-Jubelirer

Joshua Olszewski-Jubelirer